



February 19, 2009

Ms. Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW, Suite TW-A325
Washington, DC 20554

RE: EB Docket No. 06-36, Certification of CPNI Compliance Filing

Dear Ms. Dortch:

Attached is the 2008 CPNI Certification for MGW Telephone Company, Inc. If there are any questions, I can be reached at 540-925-2255.

Sincerely,

L. Ronald Smith

A handwritten signature in cursive script that reads "L. Ronald Smith".

Attachment

cc: Best Copy and Printing, Inc. (via email to fcc@bcpiweb.com)

MGW TELEPHONE COMPANY, INC.

16296 Indian Draft Road
Route 678
Williamsville, Virginia 24487

CPNI COMPLIANCE PROCEDURES IN PLACE DURING 2008

During 2008, MGW Telephone Company, Inc. ("Company"), a wholly owned subsidiary of MGW Communications, Inc., had the following procedures in place to ensure compliance with the Federal Communications Commission's Customer Proprietary Network Information ("CPNI") rules as found in Sections 64.2001 through 64.2011.

1. The Company has established procedures and Company representatives have been trained on the definition of CPNI, telecommunications, and non-telecommunications services. The Company has established a system by which the status of a customer's approval for use of CPNI, as defined by 47 U.S.C. 222(h)(1), can be clearly established prior to any use of CPNI. Company procedures have been implemented to prevent the use of CPNI without approval.
2. Company representatives are trained on circumstances when they are authorized and when they are not authorized to use CPNI. In situations when there may be questions about the proper use of CPNI, the Company's Compliance Officer is consulted before the use of CPNI. The Company has implemented a disciplinary process in case Company procedures are not followed.
3. The Company has not used CPNI for marketing and only conducts global sales and marketing campaigns through the use of bill inserts and advertisements that notify all customers of new products and services. The Company has not engaged in outbound marketing. Since the Company has not used CPNI for marketing, Opt-Out notices have not been provided to customers. If, in the future, the Company does engage in outbound marketing, CPNI rules will be followed including customer notification about the Opt-Out process and training would be reinforced. The Company Compliance Officer would be responsible for ensuring compliance with the rules.
4. In situations where customers contact the Company, procedures have been implemented for Company representatives to authenticate the identity of customers and receive their permission before any CPNI is accessed and used. The Company has also implemented procedures to notify customers of account changes.

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2008

Name of company(s) covered by this certification: MGW Telephone Company, Inc.

Form 499 Filer ID: 807990

Name of signatory: L. Ronald Smith

Title of signatory: Vice President

I, L. Ronald Smith, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. § 64.2001 et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. The company is not aware of any attempts made by pretexters to access CPNI and has not needed to take any action against pretexters. The company has taken steps to protect CPNI.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

I hereby certify that, to the best of my knowledge, information and belief, the statements contained within this certification and the accompanying statement are accurate, complete and in accordance with Commission rules.

Signature L. Ronald Smith

Date: February 19, 2009